



Office of General Counsel & External Affairs

April 29, 2022

Dr. Russell L. Johnson, Jr.
530 Mindingall Road
Tuskegee, AL 36083

RE: Outstanding Complaints

Dear Dr. Johnson,

As agreed to during our discussion via zoom on April 26, 2022, I am writing to address and resolve any issues outstanding with regard to all complaints filed, including the complaints drafted on September 12, 2020, February 11, 2021, as well as the formal complaint filed on April 25, 2022, with the Title IX office.

The issues raised in your complaint dated September 12, 2020, were considered at the informal stage by the College of Veterinary Medicine and a final decision was issued from the Office of Research and Graduate Studies on November 29, 2021. In reviewing the matter, it appears that the complaint resolution process was delayed because said complaint was with the the Office of Student Affairs and that office is designed to address conflicts between students. As the original complaint alleged a conflict between a faculty member and a student once the issues were properly identified, it was referred to the Office of Graduate Studies and Research in February 2021 for review by an office better equipped to address the issues set forth in the complaint. The complaint filed on February 11, 2021, and subsequent email dated February 19, 2021, alleged a verbal and physical altercation between students and also alleged gender disparities and retaliation. The September 2020 and February 2021 complaints were consolidated and reviewed by the committee convened by the Office of Graduate Studies and Research. The committee resolved the academic matters on November 29, 2021. The remaining issues related to gender disparity and retaliation were transferred to the Title IX office on January 18, 2022 after some initial communications with the Office of General Counsel before the Christmas break in 2021. A final determination was issued on March 31, 2022, disposing of the gender disparity claims and retaliation. The investigation concluded that the student's conduct that was the subject of the February 11, 2021 complaint was inappropriate, and a reprimand was issued forthwith.

I have reviewed many emails wherein you raised concerns regarding the timeliness of response by each unit handling the documented complaints. To ensure a more efficient method for these

types of matters going forward, a policy that explicitly governs the process for a complaint filed by a student against a faculty member that does not include a grade dispute has been developed. This policy will be added to the 2022-2023 Graduate Student Handbook.

The issues raised by your complaints and others that I have received while in this role have led to the development of guidance for positive graduate student and faculty advisor relationships here at Tuskegee University. This guidance which is attached hereto for your information and use, will be a mechanism to govern interactions through the education and research process.

Finally, your complaint filed with the Title IX Office on April 25, 2022, does not meet the criteria for investigation under Title IX. Therefore according to Title IX regulations, the complaint is being transferred to the Office of Graduate Studies and Research under the new policy guidelines. To ensure the complaint is reviewed and resolved promptly, the Office of the General Counsel will facilitate the transfer of the complaint and monitor progress through the appeal level, which terminates in the Office of the Provost.

As mentioned during the zoom call on April 26, 2022, you will need to engage with your committee to develop a research plan that will allow your continued progress towards your educational goals. I am hopeful that the guidance for positive graduate student and faculty advisor relationships will be a helpful resource in that endeavor.

Best Regards,



Crystal M. James, JD, MPH
Interim VP External Affairs & General Counsel

Cc: Dr. Ruby Perry, Dean College of Veterinary Medicine
Dr. Jeelani, Dean Graduate Studies
Dr. Hargrove, Provost



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September 26, 2022

VIA CERTIFIED MAIL
Charlotte P. Morris, Ph.D.
Office of the President
1200 W. Montgomery Road
Kresge Center, Suite 308
Tuskegee, Alabama 36088

RE: Russell Johnson Title IX Investigation

Dear Dr. Morris:

Russell Johnson, a former student of Tuskegee University's IDPB PhD Program, has retained our firm to represent him against the retaliatory actions of Tuskegee University in violation of Title IX of the Educational Amendments of 1972. The attached Title IX Decision from your Title IX Coordinator dated August 10, 2022, provides a thorough analysis and determination that Tuskegee discriminated against Dr. Johnson by retaliating against him for filing a Title IX claim.

Dr. Johnson first brought his concerns to Tuskegee back in the Summer of 2020. Without explanation, his complaint and concerns were ignored and not addressed. Indeed, they languished within the Tuskegee bureaucratic process. His concerns were finally addressed in March 2022 when a decision from the Title IX office found the respondents and Tuskegee not responsible for violating the Title IX Policy. In spite of this outcome, Tuskegee recognized the gross issues surrounding its handling and processing of complaints by members of its community. However, nothing has yet been done to rectify these issues. Dr. Johnson then filed a new complaint in July of this year alleging retaliation because his faculty advisor committee chair and co-chair resigned effectively precluding Dr. Johnson's ability to continue his education with Tuskegee. Dr. Johnson was well on his way to becoming a certified embryologist prior to Tuskegee's actions. In fact, he was awarded a scholarship to the American Embryo Transfer Association and the W. Bruce Wren Food Animal Award based on his research. Dr. Johnson's accolades and research speaks for itself. Sadly, it is now all lost, or at the very least abated, based on Tuskegee's actions.

As you are no doubt aware, Title IX prohibits educational programs receiving federal financial assistance from discriminating against students on the basis of sex. Indeed, even institutions who retaliate against those who make Title IX complaints violate Title IX. This is the case with Dr. Johnson. The actions of Tuskegee University have cost Dr. Johnson considerable money in the form of lost wages, monthly stipends, and student loan debt on a degree he cannot even complete. Additionally, he has suffered severe mental and emotional distress and his reputation has been damaged. We demand that Tuskegee University immediately cease its retaliatory actions by allowing Dr. Johnson to complete his degree with Tuskegee and reimburse Dr. Johnson for his considerable losses.

Please let me hear from you within 14 days of your receipt of this letter. Otherwise, we will have no choice but to exhaust any and all remedies available through the Office of Civil Rights and the court system.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Arthur Vaughn, II". The signature is fluid and cursive, with the first name "M." and last name "Vaughn" clearly legible, followed by "II".

M. Arthur Vaughn, II

Enclosure as stated